

December 19, 2002

RE: S. Brown Wood Products 019-15732-00078

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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(800) 451-6027
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December 19, 2002

Mr. Steve Brown
S. Brown Wood Products
1400 Service Drive
Sellersburg, Indiana 47172

Re: Exempt Construction and Operation Status,
019-15732-00078

Dear Mr. Brown:

The application from S. Brown Wood Products, received on April 1, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that construction and operation of the following spray booths, located at 1400 Service Drive, Sellersburg, Indiana, is classified as exempt from air pollution permit requirements:

The source consists of the following new facilities/units:

Two (2) spray booths, identified as Finish Booth No. 1 and Finish Booth No. 2, equipped with overhead lines for assembly, each equipped with one (1) high volume low pressure (HVLP) spray gun with paint pot, and dry filters for pollution control, exhausting through stacks SV002 and SV003, maximum capacity: 21.25 parts per hour, each.

The following conditions shall be applicable:

(1) 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

(2) Pursuant to 326 IAC 6-1-2, particulate emissions from the two (2) spray booths, identified as Finish Booth No. 1 and Finish Booth No. 2, shall be limited to 0.03 grains per dry standard cubic foot. The dry filters for particulate control shall be in operation and control emissions from the two (2) spray booths, identified as Finish Booth No. 1 and Finish Booth No. 2, at all times when the booths are in operation in order to demonstrate compliance with this rule.

(3) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

This source has been operating under permit by rule. Following the issuance of this exemption, the exempt units will be incorporated into FESOP 019-15781-00078, which is pending.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

PTB/MES

cc: File - Clark County
Clark County Health Department
Air Compliance - Ray Schick
Permit Filing - Lisa Lawrence
Air Programs Section - Michele Boner
Compliance Branch - Karen Nowak

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an
Exempt Construction and Operation

Source Background and Description

Source Name:	S. Brown Wood Products, Inc.
Source Location:	1400 Service Drive, Sellersburg, Indiana 47172
County:	Clark
SIC Code:	2499
Exemption No.:	019-15732-00078
Permit Reviewer:	Patrick Brennan/MES

The Office of Air Quality (OAQ) has reviewed a FESOP application from S. Brown Wood Products, Inc. relating to the construction and operation of the following units at the existing wood products manufacturing source:

Two (2) spray booths, identified as Finish Booth No. 1 and Finish Booth No. 2, equipped with overhead lines for assembly, each equipped with one (1) high volume low pressure (HVLP) spray gun with paint pot, and dry filters for pollution control, exhausting through stacks SV002 and SV003, maximum capacity: 21.25 parts per hour, each.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) The source has been operating under Permit By Rule following an April 22, 1997 determination by the Clean Manufacturing Technical & Safe Material Institute (CMTI) Purdue University
- (b) CP 019-4884-00078, issued on April 3, 1996.

The entire source, including the new units, will be permitted under F 019-15781-00078, which is pending.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete application for the purposes of this review was received on April 1, 2002. Additional information was received on May 21, 2002.

Emission Calculations

See pages 1 through 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of New Units

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.” This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.703
PM ₁₀	0.703
SO ₂	0.00
VOC	5.57
CO	0.00
NO _x	0.00

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Ethylbenzene	0.365
Xylene	1.10
Toluene	0.731
Formaldehyde	0.731
Isobutyl Alcohol	0.731
Ethyl Alcohol	1.10
Isobutyl Acetate	0.731
Dimethyl Ketone	0.731
TOTAL	6.21

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM₁₀ is less than five (5) tons per year, and the potential to emit VOC is less than ten (10) tons per year. Therefore, the two (2) new spray booths, identified as Finish Booth No. 1 and Finish Booth No. 2, are classified as exempt from air pollution permit requirements, pursuant to 326 IAC 2-1.1-3(e)(1).
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ from the entire source is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. The Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8, is pending.

Actual Emissions

No previous emission data has been received from the source for the years 1996 through 2000.

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Clark County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This wood products manufacturing source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR Part 63.800 Subpart JJ) because the source is not a major source of hazardous air pollutants. There are no other NESHAPs applicable to this source.

State Rule Applicability

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

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- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-1 (Particulate Limitations)

Because the source has potential particulate emissions greater than 100 tons per year and is located in Clark County, 326 IAC 6-1-2 (particulate limitations) is applicable. Pursuant to 326 IAC 6-1-2, particulate emissions from the two (2) spray booths, identified as Finish Booth No. 1 and Finish Booth No. 2, shall be limited to 0.03 grains per dry standard cubic foot. The dry filters for particulate control shall be in operation and control emissions from the two (2) spray booths, identified as Finish Booth No. 1 and Finish Booth No. 2, at all times when the booths are in operation in order to demonstrate compliance with this rule.

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Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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The two (2) spray booths, identified as Finish Booth No. 1 and Finish Booth No. 2, are equipped with HVLP spray equipment. Therefore, the booths are in compliance with this rule.

Conclusion

The construction and operation of the two (2) spray booths at this existing source shall be subject to the conditions of the attached Exempt Construction and Operation Status, 019-15732-00078.